

EXHIBIT 1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

RACHEL LYNN WILLIAMSON and
CONSTANCE NOVOA, on behalf of
themselves and all others similarly
situated,

Plaintiffs,

Case No. 1:24-cv-01526-TWP-MJD

v.

GERARDO LORENZO LINARDUCCI,
an Indiana individual,
INTEGRITY WEALTH PARTNERS, LLC, an
Indiana limited liability corporation, and
DUCCI ENTERPRISES, LLC, an
Indiana limited liability corporation,

Defendants.

DECLARATION OF ROSS GOOD

Pursuant to 28 U.S.C. § 1746, the undersigned states as follows:

1. I am an attorney licensed to practice law residing in Cook County, Illinois.
2. I represent Plaintiffs Rachel Lynn Williamson and Constance Novoa in the above-captioned matter.
3. I have personal knowledge of the facts stated herein and am competent to testify thereto.
4. I submit this declaration to address and rebut the factual assertions contained in the Declaration of Gerardo Lorenzo Linarducci filed as Dkt. 39-1 (“Linarducci Declaration”) in support of Defendants’ Motion to Dismiss, and to provide the Court with a list of identified putative class members who invested in the REAL investment program promoted by Defendants.
5. Attached hereto as Exhibit 2 is a subset of only Defendants’ investors in DRIVE

and their most recent investment date.

6. Exhibit 2 identifies 110 distinct investors, including at least 50 investors (over 45%) residing outside Indiana.

7. Exhibit 2 shows that at least 110 investors made initial investments in the REAL program between 2022 and 2024.

8. Exhibit 2 reflects that investors resided in at least 13 different states:

CA	1	1%
FL	6	5%
GA	11	11%
IL	1	1%
IN	60	54%
MD	1	1%
NC	2	2%
NE	5	4%
NJ	12	11%
NY	3	3%
OH	4	4%
OR	1	1%
PA	3	3%
TOTAL	110	

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 10/16/2025.



Ross Good